

### ***REMARKS***

Claims 30-49 were withdrawn.

Claims 20-29, 50-53, and 87-115 stand allowed.

Claims 1-3, 5-10, 12-16, and 55-86 stand rejected.

Claims 4, 11, 54, and 81 stand objected to.

Claims 1-19 are cancelled.

In accordance with the Examiner's suggestions, claim 54 is amended. No new subject matter is present in the claim.

In accordance with the Examiner's suggestions, new claims 116-121 are added. No new subject matter is present in those claims.

Claims 20-29 and 50-121 are pending. Claims 20-29, 50-53, and 87-115 are allowed. The applicant submits that the remaining pending claims 54-86 and 116-121 are allowable and such allowance is respectfully requested in light of the following remarks.

### ***35 USC §112 Rejections***

Claims 55-70 and 72 stand rejected under 35 USC §112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention.

According to the Examiner, the specification does not disclose the inner leads having a constant second thickness as recited in claim 55 (emphasis in original). The applicant disagrees. To the contrary, the application as originally filed teaches that the leads are of two portions, inner leads (116a of FIG. 3a) that are within the package body, and outer leads (116b of FIG. 3a) that are located outside the package body (page 7, lines 30-34). FIG. 3a clearly shows that the inner leads 116a (everything within the package body) are of a constant second thickness, as recited in claim 55. Applicant notes that the recited first thickness of claim 55 is in reference to the recited chip attaching part and recited peripheral part (112a and 112b of FIG. 3a).

According to the Examiner, the specification does not disclose the inner leads are formed of a single layer as recited in claims 56 and 72 (emphasis in original). The applicant disagrees. FIG. 3a clearly shows that the leads 116 (inner leads 116a and outer leads 116b) have only a single layer, represented by the cross-hatching within the leads 116, indicating a single layer. This would be apparent to one of ordinary skill in the art.

### ***35 USC §102 Rejections***

Claims 1-3, 55, 71, 57, 73, 5, 59, 75, 62-64, 78-80, and 8-10 stand rejected under 35 USC §102(b) as being anticipated by US Patent No. 5,014,113 issued to Casto, et al. (Casto). The applicant disagrees for the following reasons.

Claims 1-3, 5, and 8-10 are cancelled.

With regard to claim 55, the Examiner has stated in Paper No. 11 that Casto discloses a chip attaching part having a first thickness and the inner leads (*portion of leads 18 and 28*) having a constant second thickness greater than the first thickness (emphasis added). Claim 55 recites the inner leads to be those inside the encapsulant. The thickness of Casto's inner leads that are inside the encapsulant (elements 18 and 28 of FIG. 1) is not constant as recited in claim 55. There can be only one second thickness. If the second thickness is the thickness of elements 18 and 28 together, then the second thickness is not constant inside the encapsulant because element 18 extends further than element 28. If the second thickness is the thickness of element 18 alone then the second thickness is not greater than the first thickness as recited in claim 55. Either way, it is impossible for Casto to simultaneously anticipate both the limitation of a second thickness greater than a first thickness and the limitation of a constant second thickness. Consequently, claim 55 is allowable for at least this reason.

The applicant submits that claims 56-70 are allowable for at least the same reason as claim 55.

With regard to claim 71, the Examiner has stated in Paper No. 11 that Casto discloses bonding wires 34 connected to the portion of the inner leads (18, 28). The applicant notes that claim 71 also recites that the portion of the inner leads where the bonding wire is connected has a second thickness greater than the first thickness. It is clear from Casto FIG. 1 that the portion of the inner leads where the bonding wire 34 is connected does not have a second thickness greater than a first thickness of the chip attaching part (40) as recited in claim 71. Thus, Casto does not anticipate claim 71 and claim 71 is allowable for at least this reason.

The applicant submits that claims 72-86 are allowable for at least the same reason as claim 71.

### **35 USC §103 Rejections**

Claims 6, 7, 16, 60, 61, 76, 77, 70 and 86 stand rejected under 35 USC §103(a) as being unpatentable over Casto.

Claims 6, 7, and 16 are cancelled. Claims 60, 61, 70, 76, 77, and 86 are dependent upon either claim 55 or 71. The applicant has already shown that Casto fails to disclose all elements of claims 55 and 71. Thus, claims 60, 61, 70, 76, 77, and 86 are patentable over Casto because Casto fails to establish a *prima facie* case of obviousness with respect to them.

Claims 12-14, 66-68 and 82-84 stand rejected under 35 USC 103(a) as being unpatentable over Casto in view of Huang (2002/0113305).

Claims 12-14 are cancelled. Claims 66-68 and 82-84 are dependent upon either claim 55 or 71. The applicant has previously shown that Casto fails to disclose all elements of claims 55 and 71. Huang also fails to disclose the elements of claims 55 and 71 that Casto lacks. Thus, a *prima facie* case of obviousness is not established with respect to claims 66-68 and 82-84 because the Casto/Huang combination fails to disclose all limitations inherent to claims 66-68 and 82-84. Consequently, claims 66-68 and 82-84 are allowable for at least the same reasons as claims 55 and 71, respectively.

Claims 15, 69 and 85 stand rejected under 35 USC §103(a) as being unpatentable over Casto in view of Kozono (6,177,718).

Claim 15 is cancelled. Claims 69 and 85 are dependent upon claim 55 and 71, respectively. The applicant has previously shown that Casto fails to disclose all elements of claims 55 and 71. Kozono also fails to disclose the elements of claims 55 and 71 that Casto lacks. Thus, a *prima facie* case of obviousness is not established with respect to claims 69 and 85 because the Casto/Kozono combination fails to disclose all limitations inherent to claims 69 and 85. Consequently, claims 69 and 85 are allowable for at least the same reasons as claims 55 and 71, respectively.

### **Allowable Subject Matter**

Claims 20-29, 50-53, and 87-115 stand allowable over the prior art of record.

Claims 4, 11, 54, 58, 65, 74 and 81 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

With regard to claim 4, new claim 116 is added that contains all the limitations of claim 4 (claim 4 is henceforth cancelled) and its base claim (claim 1, which is henceforth cancelled).

With regard to claim 11, new claim 117 is added that contains all the limitations of claim 11 (claim 11 is henceforth cancelled), and claim 117 is made dependent upon allowable claim 116.

With regard to claim 54, the applicant notes that it contains the same limitation as original claim 4. Thus, it appears that when claim 54 was previously added it was mistakenly made to be dependent upon original claim 11 (original claim 11 was dependent upon original claim 4) rather than upon previously added claim 52. Since the Examiner has indicated claim 52 is allowable, claim 54 is amended to be dependent upon claim 52.

With regard to claim 58, new claim 118 is added that contains all the limitations of claim 58 and its base claim (claim 55).

With regard to claim 65, new claim 119 is added that contains all the limitations of claim 65 and its base claim (claim 55).

With regard to claim 74, new claim 120 is added that contains all the limitations of claim 74 and its base claim (claim 71).

With regard to claim 81, new claim 121 is added that contains all the limitations of claim 81 and its base claim (claim 71).

### ***Conclusion***

For the foregoing reasons, allowance of claims 20-29 and 50-121 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.



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Respectfully submitted,

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